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Via ECF

July 21, 2025

Hon. Magistrate Robert W. Lehrburger, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Francisco et al v. Exclusive Management Solution Group, Inc. et al.*
Case No.: 1:24-cv-03928

Dear Judge Lehrburger:

This office represents Plaintiffs in the above-referenced matter, and we write to respectfully request that the Court compel Defendants to produce Defendants' outstanding discovery, pursuant to the Court's Order dated January 17, 2025 [Dkt. No. 54].

On January 17, 2025, the Court ordered Defendants to produce class contact information, a class size, and class-wide documents [Dkt. No. 54].

Defendants' discovery production failed to comply with the Court's Order because Defendants produced insufficient discovery. Plaintiffs informed Defendants of their deficiency, and on May 12, 2025, the Court confirmed Plaintiffs' interpretation of the Court's January 17, 2025 Order [Dkt. No. 72]. On June 18, 2025, Plaintiffs served their First Supplemental Set of Interrogatories and Requests for Production of Documents, of which Defendants' responses were due on July 18, 2025. Plaintiffs communicated with Defendants on July 18, 2025, but no response was served. As of the date of this letter, Defendants have not produced the outstanding discovery.

Accordingly, we request the Court compel Defendants to produce all outstanding discovery by July 25, 2025.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ C.K. Lee

cc: all parties via ECF

The application is denied without prejudice as it is not apparent to the Court that Plaintiffs have fulfilled their obligation to meet and confer.

SO ORDERED:

7/21/2025


HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE